

This Robocall Mitigation Plan is submitted by Lenox Municipal Utilities pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

The Provider does not have a switch but instead partners and uses as its originating switch with The Farmers Mutual Telephone Company of Stanton, Iowa (FMTC) with headquarters at 410 Broad Ave, Stanton, Iowa 51573.

FMTC performs the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

Neither Lenox Municipal Utilities nor FMTC have been prohibited from filing a certification in the Robocall Mitigation Database.

Neither Lenox Municipal Utilities nor FMTC have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Lenox Municipal Utilities uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level FMTC assigns to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

Lenox Municipal Utilities and FMTC have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

Lenox Municipal Utilities and FMTC confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

Lenox Municipal Utilities and FMTC require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

Lenox Municipal Utilities and FMTC establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

To the degree the FMTC has any contractual provisions with upstream providers, such provisions will prohibit them from sending illegal robocalls to the FMTC switch. If FMTC finds that an upstream provider is sending suspicious robocalls, FMTC will initiate the warranted protocols to determine steps necessary to terminate the processing of such traffic.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Lenox Traceback contact is: Jeff Tull at 641-333-2550 or jeff@lenoxia.com

Robocall Mitigation Program

FMTC uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

The same mitigation steps are used for all outbound calls regardless of our role in the call chain for a particular call.

We together with FMTC will immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If it is determined that the traffic was likely unlawful, then we together with FMTC warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we will terminate their service.

STIR/SHAKEN

Lenox Municipal Utilities has registered with the STI-PA using OCN 168F. Lenox and FMTC have STIR/SHAKEN certificates issued by the TransNexus Certification Authority (STI-CA) that is used when authenticating calls we originate. FMTC has implemented a STIR/SHAKEN solution supplied by TransNexus.

FMTC and therefore Lenox Municipal Utilities is exempt from STIR/SHAKEN implementation requirements for some calls because these calls rely on non-IP technology - 47 CFR 64.6304(d). More specifically, although all of the FMTC's network facilities are at this time IP capable and able to originate and deliver VoIP calls, certain of FMTC's upstream provider(s) which are receiving originated local or interexchange voice traffic are currently only offering non-IP connectivity for such traffic – no IP connectivity is available from the upstream provider(s) enabling the continued transmission of Provider's VoIP traffic in Session Internet Protocol (SIP), with a continued transfer of STIR-SHAKEN attestation data.